

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
Eastern Division**

**J&J SPORTS PRODUCTIONS, INC., )  
v. Plaintiff, ) Case No. 2011-cv-7681  
JOSE M. BONILLA, indv. and d/b/a LOS )  
ARCOS DE JALISCO, INC. d/b/a LOS ARCOS )  
TAQUERIA #3, and LOS ARCOS DE )  
JALISCO, INC. d/b/a LOS ARCOS TAQUERIA)  
#3, Defendants. )**

**MOTION TO ENTER JUDGMENT PURSUANT TO SETTLEMENT**

**NOW COMES** the Plaintiff, J&J SPORTS PRODUCTIONS, INC., by its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., respectfully requests that this Honorable Court enter judgment against the Defendant, JOSE M. BONILLA, pursuant to the terms of the settlement and in support thereof, states as follows:

1. This matter was filed with the United States District Court, Northern District of Illinois on October 28, 2010.
2. That in March, 2012, a Settlement Agreement was reached between the parties wherein which the Defendant would pay the Plaintiff a total sum of Six Thousand and No/100 (\$6,000.00) Dollars. (See attached Exhibit A).
3. Pursuant to the Settlement Agreement, Defendant would make monthly payments on the Thirtieth (30) of each month to Plaintiff beginning on March 30, 2012 and continuing through September 30, 2012. See attached Exhibit A.
4. In the event of a default under this agreement, all sums not paid shall come immediately due and owing in full, and Defendant further agreed to pay a default penalty in the amount of \$3,000.00 and all reasonable attorney's fees, court costs and other costs incurred as a result of said default. See attached Exhibit A.

5. As of the date of the filing of this motion Defendant has failed to make any payments pursuant to the Settlement Agreement.

6. That Plaintiff is further entitled to One Thousand Nine Hundred Ninety and 25/100 (\$1,990.25.00) Dollars for attorney's fees and costs. See Affidavit of Plaintiff's Counsel, Andre Ordeanu, (attached hereto and made a part hereof, as Plaintiff's Exhibit "B").

**WHEREFORE**, the Plaintiff, J&J SPORTS PRODUCTIONS, INC., respectfully prays this Honorable Court grant Plaintiff's Motion to Enforce the Settlement Agreement in an amount of Six Thousand and No/100 (\$6,000.00), plus Three Thousand (\$3,000.00) in a default penalty and attorney's fees and costs in the amount of One Thousand Nine Hundred Ninety and 25/100 (\$1,990.25) Dollars, for a total Judgment in the amount of Ten Thousand Nine Hundred Ninety and 25/100 (\$10,990.25) and for such other relief for Plaintiff as this Court deems just and right.

s/ Andre Ordeanu  
Andre Ordeanu

**CERTIFICATE OF SERVICE**

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on June 12, 2012, using the CM/ECF system as well as mailed to the Defendants via Certified and Regular mail. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu  
Andre Ordeanu

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